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February 22, 2021

Via Electronic Filing

The Honorable District Judge Stewart D. Aaron
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *He v. China New Star Restaurant, Inc. et al*
Case No.: 1:19-cv-05907-PKC-CLP

Dear Honorable Judge Chen:

This law firm represents Defendants Po Kum Chan (as assignee of Po Kum Ng), Ronald Chan, Roy Chan, Jiazhen Liao, Joseph Chan, and Elton Chan (collectively, the “Defendants”). This law firm is in the process of being retained by Defendant Ching Man Hong.

Pursuant to Your Honor’s Individual Motion Practices Rule 1(G), this letter respectfully serves a request for a brief extension of time through and including this Friday, February 26, 2021, to reply to Your Honor’s Order dated February 18, 2021 [Dckt. No. 115] (the “Order”) on the basis that this law firm has been recently retained.

Your Honor’s Order, in relevant part, ordered that:

(2) Po Kum Chan, Elton Chan, Wai Leung Chan, and Wai Shun Chan turn over to the Sheriff, within 5 days of this Order, any Mortgage Proceeds they received following the Court’s October 22, 2020 Memorandum and Order authorizing attachment of the Mortgage Proceeds;

Your Honor’s Order further ordered that:

(3) pursuant to CPLR § 6219, Po Kum Chan and Elton Chan, within 5 days of this Order, and Kristy Ling Feng Li, within 5 days of being served with this Order, each serve on the Sheriff a statement specifying all debts of each garnishee to Defendants Wai Shun Chan and Wai Leung Chan and when such debts are due, all property in their possession or custody in which Defendants Wai Shun Chan and Wai Leung Chan have an interest, and the amounts and value of the debts and property specified, specifically with regard to the Mortgage Proceeds.

[Dckt. No. 115]

Pursuant to Your Honor’s Individual Motion Practices Rule 1(G)(i),(ii),(iii), and (iv), the original deadline date is today, February 22, 2021; no previous request for an adjournment has been made; and this request is made on consent of Plaintiff’s counsel.

The undersigned wishes to apologize, in advance, for any inconvenience caused by filing this letter less than two (2) working day prior to the scheduled filing deadline, as required by Your Honor’s

Individual Motion Practices Rule 1(G). The delay was occasioned by the undersigned law firm's recent retention.

Thus, in light of the foregoing, Defendants respectfully request an extension of time to respond to the February 18, 2021 Order [Dckt. No. 115] from February 22, 2021, to, through and including, February 26, 2021.

Thank you, in advance, for your time and attention.

Dated: February 22, 2021
New York, New York

Respectfully submitted,

By: /s/Joshua D. Levin-Epstein
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VIA ECF: All Counsel